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PEERLESS BEVERAGE COMPANY

Wholesale Purveyors of Fine Malt Beverages

DEPT. OF TRANSPORTATION
DOCKETS

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April 21, 2003

Documents Management System
U.S. Department of Transportation
Room Plaza - 401
400 Seventh Street, S.W.
Washington, D.C. 20590-0001.

NAME: SCOTT BEIM
BUSINESS NAME: PEERLESS BEVERAGE COMPANY
ADDRESS: 1000 FLORAL AVE, UNION, NJ 07083
PHONE: 908 351-0101 X208
DOCKET NUMBER: FMCSA-2002-12334 - 412

1. Please indicate your primary occupation(s) from the following list:

Truck Driver	Owner-Operator
Motor Coach / Bus Driver	Fleet Manager / Owner
Company Safety Director	Transit System Administrator
Commercial Driver Trainer	Motor Carrier Insurance Provider
Risk Assessment Specialist	Labor Union Representative
Motor Vehicle Admin.(State Driver's Licenses)	Enforcement Officer (motor carrier safety)
Public Interest Group	Other Owner- Beer Distributorship

2. Do you think a graduated commercial driver's license (GCDL) is needed?

Yes ☒ No ☐

3. Should issuance of a GCDL be linked to enrollment in a commercial driving training program?

Yes ☒ No ☐

4. Should the curricula of a commercial driver training program meet widely-endorsed standards for a student to be eligible to receive a GCDL while in training?

N/A

5. Approximately how many months/years of entry level training and experience should new drivers receive before "graduating" to an unrestricted CDL?

One Year

6. Should an applicant's past driving record be considered in issuing a GCDL?

Yes X

No

7. How many of each of the following types of motor vehicle accidents and convictions within the past 12 months should cause an application to be denied a GCDL?

Passenger car or light truck motor
vehicle accidents
DUI /DWI convictions
Reckless driving convictions

Other convictions for motor vehicle
traffic control violations
Controlled substances convictions
Traffic violations and citations

X All Of Above

8. Should penalties for drivers holding a GCDL, who have at-fault accidents or moving violations, be more severe than those for drivers with an unrestricted CDL?

N/A

9. How many months/years of passenger car or light truck driving experience should an applicant have before being issued a GCDL?

One Year

10. Which of the following restrictions should apply to entry level drivers operating under a GCDL?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Reduced hours of service | Other |
| <input checked="" type="checkbox"/> Limitations on equipment type (e.g., doubles/triples, tank vehicles, motor coaches, etc.) | <input checked="" type="checkbox"/> Limitations on types of cargo (e.g., hazardous materials, livestock, liquids, etc.) |
| Limitations on weather and visibility conditions (e.g., ice, snow, fog, night driving) | Limitations on geography or terrain features (e.g., mountains) |
| <input checked="" type="checkbox"/> Limitations on distance or types of highways (e.g., miles per day, interstate highways, etc.) | |

11. Should a fully licensed CDL driver be required to accompany and observe a driver with a GCDL? If yes, for how many weeks/months/years?

Yes

No ☒

12. What is the minimum age at which an applicant should be eligible to receive a graduated CDL?

18 Years Old

13. Assuming that training requirements are met, what is the minimum age at which the holder of a graduated CDL should be eligible to graduate to an unrestricted CDL?

18 Years old

14. How much testing (knowledge and road test) should be given to GCDL holders prior to issuing an unrestricted CDL?

☒ Single test to "graduate" to an
unrestricted CDL
Initial test plus re-test at 1 year after
receiving initial GCDL

Periodically while holding a GCDL until
training is complete
Other

15. What other factors do you feel must be addressed in the implementation of a graduated CDL program?

15. In light of the situation regarding our business I do not feel that drivers need ever graduate to a full, unrestricted CDL. If CDLs are restricted by age of driver, weight of vehicle, length of vehicle, terrain, distance driven, conditions, time of day and other factors, then businesses of our size and makeup don't need to see drivers graduate to a full CDL to be valuable to a beer wholesaler or other small business engaged in local delivery. I urge the DOT to consider implementing a system of graduated licensing in which each level of the GCDL can be considered a CDL in its entirety and need not necessarily be considered only a stepping-stone to the unrestricted CDL.

16. What costs would you or your organization anticipate incurring if a GCDL program is implemented?

16. A GCDL could actually result in cost savings for beer wholesalers and small business, in general. Beer wholesalers bear the financial burden of training CDL drivers, and are happy to do so. However, we constantly lose drivers as they become over the road drivers, we then must begin the process all over again at a significant expense. If my business could employ a driver who had mastered a set of skills that allowed him to safely operate a commercial vehicle for delivering our product, without a full, unrestricted CDL, that would result in a cost savings for my business. These savings could then be used for greater job creation, warehouse improvement, greater retail execution and a host of other pro-growth economic initiatives. We have now many qualified job applicants who are capable drivers and could provide far more employment opportunities if the CDL was graduated. We strongly recommend a graduated approach.